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1 UNITED STATES DISTRICT COURT
2
3 WESTERN DISTRICT OF TEXAS
4
5 SAN ANTONIO DIVISION

6 DR. JOHN ROE,

7 Plaintiff,

CASE NUMBER:

8 v.

5:22-CV-00869-JKP-HJB

9 UNITED STATES, et al.

10 Defendants.

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15 DEPOSITION OF DR. [REDACTED] [REDACTED]

16 Washington, D.C.

17 Thursday, May 8, 2025

18 10:05 a.m.

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23 Job No. CS 7351249

24 Pages: 1 - 172

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Transcribed by: Danielle E. Lawrence

Job No. CS1

DEFENDANT'S
EXHIBIT

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P R O C E E D I N G S

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DR. [REDACTED] [REDACTED]

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Having duly been sworn, testifies as follows:

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MR. GONZALEZ: Good morning. My name is Joseph Gonzalez. I'm joined with my colleague, Katie Seeman. We represent the United States, Defendant.

MR. WAREHAM: I'm Jason Wareham. I represent the Plaintiff and the Plaintiff's here with me in person.

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MS. SEEMAN: And we're also joined by

Robert Green, also counsel for Defendant, virtually.

DIRECT EXAMINATION BY COUNSEL FOR DEFENDANT

BY MR. GONZALEZ:

Q. Good morning, Dr. [REDACTED] Thank you for being here. Could you please state your full name for the record?

A. [REDACTED] [REDACTED] [REDACTED]

Q. Dr. [REDACTED] have you ever been deposed before?

A. No.

Q. So, it's like a discovery device to obtain information for a lawsuit. You've been put under oath and I ask you questions, you answer them to the best of your ability. So, you have a responsibility to tell the truth, do you understand that?

A. Yes.

1 A. For this time period doing specifically what I
2 was doing? They're not doing exactly the same thing.
3 This market analysis was very specific to what was being
4 done at HNCO at which the time I was doing my work.
5 It's a very specific niche or small area of CyberAI work
6 that includes offensive -- predominately offensive work,
7 specifically at TS/SCI level and, specifically,
8 compartmented level.

9 Q. So, you identified these companies not just
10 because they do offensive cyber work, but because they
11 do a specific kind of CyberAI work, is that correct?

12 A. Correct, that's a fair market analysis. It
13 would be unfair otherwise.

14 Q. But there are other companies beyond these five
15 that do CyberAI work in general, like Leidos?

16 A. There are other companies that do cyber work in
17 general. There are thousands.

18 Q. But offensive CyberAI work in general?

19 A. No.

20 Q. These are the only five?

21 A. There are other companies that do offensive
22 cyber work. There are other companies that purport to
23 do offensive CyberAI work. But within the TS/SCI
24 specifically compartmented levels, these are the five
25 that do that for the Air Force. That was the

1 A. As a consultant, no. As an individual helping
2 another company, yes.

3 Q. Tell me about that circumstance, please.

4 A. I helped write and do the numerical analysis for
5 several contracts that were awarded to StarNav.

6 Q. So, StarNav was the one that applied for those
7 contracts, correct?

8 A. That's correct. I was recruited as a technical
9 expert.

10 Q. How many employees does StarNav have?

11 A. Maybe 10.

12 Q. I just want to make sure I understand that. As
13 either [REDACTED] LLC, as a consultant or just you
14 personal, you have never bid on a prime contract,
15 correct?

16 A. I have never bid on a prime correct. I've been
17 recruited to work on contracts.

18 Q. Got it.

19 A. In the case of the work that I did for HNCO, I
20 was recruited because my subject matter expertise, at
21 the time, I was the only person that could do this work
22 in the U.S. government at the TS/SCI level, specifically
23 in the compartmented level.

24 Q. I'm aware. I've done my research. I'm just
25 asking about the bid, though?

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3 I, Danielle Lawrence, court reporter, the
4 officer before whom the foregoing proceedings were
5 heard, do hereby certify that the foregoing transcript
6 and said proceedings were taken by me stenographically
7 and thereafter reduced to typewriting under my
8 supervision; and that I am neither counsel for, related
9 to, nor employed by any of the parties to this case and
10 have no interest, financial or otherwise, in its
11 outcome.

12

13 IN WITNESS WHEREOF, I have hereunto set my
14 hand and affixed my notarial seal this 20th day of
15 May 2025.

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STATE OF MARYLAND